

1 Q. Well, do you know if there's any type of  
2 encryption on the file from Merchants & Medical  
3 to Hatteras?

4 A. Yes.

5 Q. Okay. So, I'm just trying to find out whatever  
6 information you can provide me about the  
7 encryption that is used.

8 A. SSH, SFTP.

9 Q. Okay. Is there any other information that you  
10 have besides that?

11 A. No.

12 Q. Okay. And what happens with the file once it  
13 is transmitted to Hatteras?

14 A. You would have to ask Hatteras.

15 Q. So Merchants & Medical doesn't know what  
16 Hatteras does with the information after it's  
17 transmitted to Hatteras?

18 MS. OLSON: Objection. Form and  
19 foundation.

20 A. I don't know what their procedures are exactly.

21 Q. Is there anyone at Merchants & Medical who  
22 would know what their procedures are?

23 A. Not to my knowledge.

24 Q. Is there any type of agreement with Hatteras  
25 that would explain what Hatteras is or is not

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 A. Outside of their SOC sock audit, which we  
17 review, which outlines the controls that they  
18 have in place on protecting consumer  
19 information, that is the information that we  
20 have.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**25 Q. How often are these SOC audits performed?**

1 A. If I remember correctly, I believe they're  
2 performed yearly.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Are you able to see the collection

8 letter?

9 A. Yes.

10 Q. Okay. So, on the top left-hand side underneath  
11 the Merchants & Medical logo, there is a regard  
12 line and it has your Kohl's credit card  
13 account, a bunch of asterisks, and then 5078.

14 Do you see that?

15 A. Yes, I do.

16 Q. Okay. Is that line populated with information  
17 sent by Merchants & Medical to Hatteras?

18 A. Which line? The line beginning R-E?

19 Q. Correct.

20 A. Yes, we send that.

21 Q. Okay. Do you also send the information that's  
22 used to calculate a settlement offer? So, in  
23 this case, there was a settlement offer of, it  
24 says, 40 percent.

25 A. Yes, we send that.

1 Q. Okay. I see that this letter appears to be  
2 from a Kathy Vickers at extension 412. Is that  
3 information that is sent by Merchants & Medical  
4 to Hatteras?

5 A. Yes.

6 Q. Okay. Do you know if that information, like  
7 for instance Kathy Vickers, extension 412, is  
8 specific to certain accounts or if that  
9 information would appear on all the letters  
10 that are sent by Hatteras?

11 A. Please allow me to clarify my statement.

12 Q. Of course.

13 A. I believe that this letter that Kathy Vickers  
14 and the top part that says 40 percent off, pay  
15 60 percent of your debt and it's resolved, I  
16 believe all of that is simply part of our  
17 template.

18 So I do not believe that each one of  
19 those words is transmitted each time. It's  
20 simply part of the template that they have on  
21 file.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3                    Did Ms. Moore ever give permission to  
4           Merchants & Medical to disclose her information  
5           to Hatteras?

6                    MS. OLSON: Objection. Form.

7 A.           I'm just reviewing the notes to see if we ever  
8           had any communication with her outside of your  
9           communication with her office.

10                   No, I don't show that we had any  
11           communication with Ms. Moore.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]